

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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|---|------------------------------|
| BRIAN MILLER; HECTOR CALDERON; | : |
| CHARLES FOLWELL; ROLLAND GREEN; | : |
| DAWN M. HAUCK; KEVIN KEIR; | : |
| ASHBY LINCOLN; KAREN MASINO; | : |
| ROBERT W. PETERSON; SUSAN M. POKOISKI; | : |
| DAN P. ROLLINS; and WILLIAM SPERATI, | : C.A. No. 05-010-JJF |
| | : |
| Plaintiffs, | : JURY TRIAL DEMANDED |
| | : |
| v. | : |
| | : |
| COMPUTER SCIENCES CORPORATION, | : |
| a Delaware Corporation, | : |
| | : |
| Defendant. | : |

**PLAINTIFFS' MOTION FOR EXTENSION OF THE DEADLINE FOR
COMPLETION OF DISCOVERY AND ORDER**

Plaintiffs, by and through their undersigned counsel, hereby respectfully submit pursuant to Local Rule 16.5, their Motion for Extension of the Deadline for Completion of Discovery, and in support thereof state as follows:

1. On May 31, 2005 this Court released the Pretrial Scheduling Order in this matter.
2. As part of that Scheduling Order, ¶ 4(a) holds:

Exchange and completion of interrogatories, identification of all fact witnesses and document production shall be commenced so as to be completed by October 14, 2005.
3. According to this Paragraph, the discovery mentioned in this paragraph should have been served by September 14, 2005.
4. In recent weeks, Plaintiffs' counsel has handled, and continues to handle a very heavy caseload. Due to this, Plaintiffs' counsel was simply unable to complete and

serve Plaintiffs' discovery upon Defendant by September 14, 2005. Upon realization of this, at approximately 7:00 a.m. on Wednesday, September 14, 2005, Plaintiff's counsel placed a call to defense counsel and left a message requesting an extension of seven (7) days in which to serve their discovery. Plaintiff's counsel stated that it would, of course, provide Defendant any extra time that they need to respond to that discovery.

5. At 3:00 p.m., after two more telephone messages were left for defense counsel regarding the request, defense counsel finally returned the call and stated that it would have to check with their client to determine if such an accommodation could be provided. It was represented that they hoped to provide an answer by the end of the day.

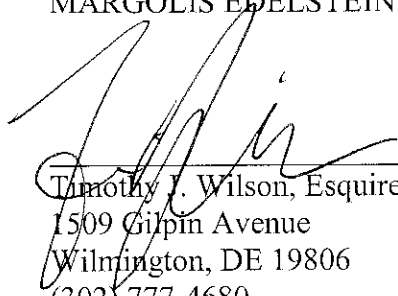
6. There was no return call that day, or the next. Plaintiff's counsel called again on Friday morning, September 16, 2005 requesting some form of answer – one way or the other.

7. Later that day, defense counsel called and refused the requested accommodation. Hence, Plaintiffs regret that they are forced to turn to the Court and utilize its resources to resolve this seemingly minor issue.

8. Plaintiffs' request to extend the discovery deadline by seven (7) days is not unreasonable. Moreover, Defendant will incur no prejudice if the Court graciously grants this motion.

WHEREFORE, Plaintiffs respectfully request a seven (7) day extension to the discovery deadline in the Pretrial Scheduling Order.

MARGOLIS EDELSTEIN

A handwritten signature in black ink, appearing to read 'Tim Wilson', is written over a horizontal line.

Timothy J. Wilson, Esquire (I.D. #4323)

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Attorney for Plaintiffs

Dated: September 16, 2005